

Mark E. Merin (State Bar No. 043849)
 Paul H. Masuhara (State Bar No. 289805)
 LAW OFFICE OF MARK E. MERIN
 1010 F Street, Suite 300
 Sacramento, California 95814
 Telephone: (916) 443-6911
 Facsimile: (916) 447-8336
 E-Mail: mark@markmerin.com
 paul@markmerin.com

Attorneys for Plaintiffs
 ESTATE OF CHARLES CHIVRELL,
 ARIELLE CHIVRELL, K.C., and D.C.

PATRICK MORIARTY, State Bar No. 213185
 pmoriarty@cmtrlaw.com
 JOHN ROBINSON, State Bar No. 297065
 jrobinson@cmtrlaw.com
 CASTILLO, MORIARTY, ROBINSON, LLP
 75 Southgate Avenue
 Daly City, CA 94015
 Telephone: (415) 213-4098

Attorneys for Defendants
 CITY OF ARCATA, ARCATA POLICE
 DEPARTMENT, BRIAN AHEARN,
 BRIAN HOFFMAN, JOSEPH RODES,
 and EVAN BEECHEL

THE ZWERDLING FIRM, LLP
 Heidi Holmquist Wells (SBN 266307)
 804 3rd Street
 Eureka, CA 95501
 Telephone: (707) 798-6211
 Fax: (707) 798-6240
 hhwells@zwerdlinglaw.com

Attorney for Plaintiffs
 A.C., C.C., D.C., and T.C.

ROB BONTA
 Attorney General of California
 JEFFREY R. VINCENT
 Supervising Deputy Attorney General
 KYMBERLY E. SPEER
 Deputy Attorney General
 State Bar No. 121703
 1515 Clay Street, 20th Floor
 P.O. Box 70550
 Oakland, CA 94612-0550
 Telephone: (510)879-0985
 Fax: (510) 622-2270
 E-mail: Kymberly.Speer@doj.ca.gov

Attorneys for Defendants
 STATE OF CALIFORNIA, CALIFORNIA
 HIGHWAY PATROL, MICHAEL GRIFFIN,
 and MOISES CORNEJO MERCADO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ESTATE OF CHARLES CHIVRELL,
 ARIELLE CHIVRELL, K.C., and D.C.,

Plaintiffs,

vs.

CITY OF ARCATA, ARCATA POLICE
 DEPARTMENT, BRIAN AHEARN,
 BRIAN HOFFMAN, JOSEPH RODES,
 EVAN BEECHEL, STATE OF CALIFORNIA,
 CALIFORNIA HIGHWAY PATROL,
 MICHAEL GRIFFIN, MOISES CORNEJO
 MERCADO, and DOE 1 to 20,

Defendants.

A.C., C.C., D.C., and T.C.,

Case No. 4:22-cv-00019-HSG

STIPULATION RE EXPERT DISCOVERY CUT-OFF; ORDER

Related Case No. 4:22-cv-04804-HSG

1 Plaintiffs,

2 vs.

3 CITY OF ARCATA, ARCATA POLICE
4 DEPARTMENT, BRIAN AHEARN,
5 BRIAN HOFFMAN, MOISES CORNEJO
6 MERCADO, EVAN BEECHEL, JOSEPH
7 RODES, MICHAEL GRIFFIN, and DOES 1 to 20,

8 Defendants.

9 IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendants (hereinafter, “the
10 Parties”), through their respective counsel of record, as follows:

11 WHEREAS, on October 17, 2024, the Court issued a Scheduling Order (ECF No. 132), which set
12 the expert discovery cutoff for April 18, 2025;

13 WHEREAS, the Parties have diligently pursued discovery and have completed nearly all
14 depositions;

15 WHEREAS, due to scheduling conflicts and availability, the deposition of Plaintiffs’ expert,
16 Roger Clark, could not be completed before the April 18, 2025 deadline;

17 WHEREAS, the Parties have conferred and agree to extend the expert discovery deadline solely
18 for the purpose of completing the deposition of Roger Clark;

19 NOW, THEREFORE, the Parties respectfully request and stipulate that the expert discovery
20 cutoff be extended to April 29, 2025, for the limited purpose of taking the deposition of Plaintiffs’ expert,
21 Roger Clark, with all other dates and deadlines in the Scheduling Order to remain unchanged.

22 IT IS SO STIPULATED.

23 Dated: April 7, 2025

24 Respectfully Submitted,
25 CASTILLO MORIARTY ROBINSON, LLP

26 /s/ Patrick Moriarty

27 By: _____
28 Patrick Moriarty
John Robinson

Attorneys for Defendants
CITY OF ARCATA, ARCATA POLICE
DEPARTMENT, BRIAN AHEARN,
BRIAN HOFFMAN, JOSEPH RODES,

and EVAN BEECHEL

Dated: April 7, 2025

LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

By: _____

Mark E. Merin

Paul H. Masuhara

Attorneys for Plaintiffs

ESTATE OF CHARLES CHIVRELL,
ARIELLE CHIVRELL, K.C., and D.C.

Dated: April 7, 2025

THE ZWERDLING LAW FIRM, LLP

/s/ Heidi Holmquist Wells

By: _____

Heidi Holmquist Wells

Attorney for Plaintiffs

A.C., C.C., D.C., and T.C.

Dated: April 7, 2025

/s/ Kymberly E. Speer

By: _____

Jeffrey R. Vincent

Kymberly E. Speer

Attorneys for Defendants

STATE OF CALIFORNIA, CALIFORNIA
HIGHWAY PATROL, MICHAEL GRIFFIN,
and MOISES CORNEJO MERCADO


ORDER

Pursuant to the Parties' stipulation and good cause appearing, the Court hereby ORDERS as follows:

The expert discovery cutoff is extended to April 29, 2025, for the limited purpose of completing the deposition of Plaintiffs' expert, Roger Clark. All other deadlines set forth in the Court's Scheduling Order (ECF No. 132) shall remain unchanged.

IT IS SO ORDERED.

Dated: 4/8/2025


Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT JUDGE